

Presented to the Court by the foreman of the  
Grand Jury in open Court, in the presence  
of the Grand Jury and FILED in the U.S.  
DISTRICT COURT at Seattle, Washington

September 10, 2020

WILLIAM M. McCOOL, Clerk

By  Deputy

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

KELLY THOMAS JACKSON,

Defendant.

NO. **CR20-148 JLR**

INDICTMENT

The Grand Jury charges that:

**COUNT 1**

***(Unlawful Possession of a Destructive Device)***

On or about May 30, 2020, at Seattle, within the Western District of Washington,  
KELLY THOMAS JACKSON did knowingly possess a destructive device, that is, an  
incendiary device known as a Molotov cocktail, that was not registered to him in the  
National Firearms Registration and Transfer Record.

All in violation of Title 26, United States Code, Sections 5861(d) and 5845(a)(8).

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**COUNT 2**

***(Arson)***

On or about May 30, 2020, at Seattle, in the Western District of Washington, KELLY THOMAS JACKSON did maliciously damage and destroy, and attempt to damage and destroy, by means of an explosive, a vehicle, namely, Vehicle 5, that was used by the Seattle Police Department in interstate and foreign commerce and in an activity affecting interstate and foreign commerce, and that was in whole or in part owned and possessed by the Seattle Police Department, an institution and organization receiving Federal financial assistance.

All in violation of Title 18, United States Code, Sections 844(f)(1) and 844(i).

**COUNT 3**

***(Unlawful Possession of a Destructive Device)***

On or about May 30, 2020, at Seattle, within the Western District of Washington, KELLY THOMAS JACKSON did knowingly possess a destructive device, that is, an incendiary device known as a Molotov cocktail, that was not registered to him in the National Firearms Registration and Transfer Record.

All in violation of Title 26, United States Code, Sections 5861(d) and 5845(a)(8).

**COUNT 4**

***(Arson)***

On or about May 30, 2020, at Seattle, in the Western District of Washington, KELLY THOMAS JACKSON did maliciously damage and destroy, and attempt to damage and destroy, by means of an explosive, a vehicle, namely, Vehicle 6, that was used by the Seattle Police Department in interstate and foreign commerce and in an activity affecting interstate and foreign commerce, and that was in whole or in part owned and possessed by the Seattle Police Department, an institution and organization receiving Federal financial assistance.

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1 All in violation of Title 18, United States Code, Sections 844(f)(1) and 844(i).  
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4 A TRUE BILL:

5 DATED: *September 10, 2020*

6 *Signature of foreperson redacted*  
7 *pursuant to the policy of the Judicial*  
8 *Conference of the United States*

9 FOREPERSON

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12 BRIAN T. MORAN  
13 United States Attorney

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15 TODD GREENBERG  
16 Assistant United States Attorney  
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